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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN DROWNS, an individual,

Plaintiff,

V.

GNLV, LLC, a Domestic Corporation; DOES 1-20; ROE CORPORATIONS 1-20; inclusive.

Defendants.

Case No. 2:23-cv-02066-CDS-NJK

**STIPULATION AND PROPOSED ORDER
TO EXTEND THE DISCOVERY CUTOFF
DEADLINE TO OCTOBER 25, 2024**

IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of record, that the **current discovery cutoff deadline be extended as set forth on page 3** pursuant to Local Rule 26-1(b).

I. DISCOVERY COMPLETED TO DATE

1. The parties have conducted the FRCP 26.1 Early Case Conference.
2. The parties have produced their respective Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a).
3. Plaintiff has propounded discovery to Defendant.
4. Defendant has propounded discovery to Plaintiff.
5. Plaintiff has responded to Defendant's discovery requests.
6. Defendant has responded to Plaintiff's discovery requests.

- 1 7. Inspection of the room and the area where Plaintiff's alleged slip and fell.
- 2 8. Deposition of Plaintiff.
- 3 9. Initial expert disclosures.
- 4 10. Rebuttal expert disclosures.

5 **II.**

6 **DISCOVERY THAT REMAINS TO BE COMPLETED**

- 7 1. Deposition of FRCP 30(b)(6) witness of Defendant GNLV, LLC, currently
8 scheduled for October 14, 2024.
- 9 2. Deposition of Amrita Roopnarine currently scheduled for October 7, 2024.
- 10 3. Deposition of Elijah Johnson, M.D. currently scheduled for September 25, 2024.
- 11 4. Deposition of Adam Hjorth currently scheduled for October 21, 2024.
- 12 5. Deposition(s) of Plaintiff's treating physicians.

13 **III.**

14 **REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES**

15 The parties aver, pursuant to Local Rule 26-3, that good cause exists for the following
16 requested extension. This Request for an extension of time is not sought for any improper
17 purpose other purpose of delay. Good cause exists as the parties require additional time to depose
18 Amrita Roopnarine, Elijah Johnson, M.D. and Adam Hjorth.

19 **The deposition of Amrita Roopnarine (Plaintiff's wife) is traveling for a funeral and
is now available on October 7, 2024.**

20 **The deposition of Elijah Johnson, M.D. is confirmed and will go forward on
September 25, 2024.**

21 **The deposition of Adam Hjorth is confirmed and will go forward on October 21,
2024.**

22 **The deposition of FRCP 30(b)(6) witness for GNLV has been confirmed for October
14, 2024.**

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1 As of now, the depositions have been scheduled before the current discovery cutoff date.
 2 Counsel for the parties have been in regular contact to attempt to get all depositions set before
 3 the current discovery cut-off. However, due to scheduling conflicts, some witnesses will now
 4 have to be deposed after the current discovery cutoff date subject to the approval of this court.

5 **Extension or Modification of The Discovery Plan and Scheduling Order.**

6 LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order.
 7 Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must
 8 be made no later than twenty-one (21) days before the expiration of the subject deadline and
 9 must comply fully with LR 26-3. If the stipulation is made less than twenty-one (21) days before
 10 the expiration of a deadline, the parties must show a good cause exist. Counsel have been in
 11 regular contact and have been working together to complete the outstanding depositions by
 12 September 27, 2024. However, it has recently become evident the parties need a short extension
 13 on the cutoff date only to October 25, 2024, to complete these depositions.

| Discovery Deadline | Current Deadline | Proposed Deadline |
|---------------------------------|----------------------------|------------------------------|
| Motion to Amend/Add Parties | April 23, 2024 (No change) | April 23, 2024 (No change) |
| Initial Expert Disclosures | July 26, 2024 | July 26, 2024 (no change) |
| All Rebuttal Expert Disclosures | August 26, 2024 | August 26, 2024 (no change) |
| Discovery Cut-Off Date | September 27, 2024 | October 25, 2024 |
| Dispositive Motions | October 10, 2024 | October 10, 2024 (no change) |

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STIPULATION

The parties represent this Stipulation is sought in good faith and not interposed for delay or any other improper purpose.

Dated this 20th day of September 2024.

Dated this 20th day of September 2024.

THE RICHARD HARRIS LAW FIRM

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED September 30, 2024